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Co-Lead Counsel for Plaintiffs

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re NVIDIA CORP. DERIVATIVE
LITIGATION

This Document Relates To:

ALL ACTIONS.

) Master File No. C-06-06110-SBA
)

) STIPULATION AND ~~PROPOSED~~ ORDER
) REGARDING FILING OF CONSOLIDATED
) COMPLAINT
)
)
)

1 This Stipulation is entered into by and among plaintiffs and nominal defendant NVIDIA
2 Corp. ("NVIDIA") and defendants Jen-Hsun Huang, Marvin D. Burkett, Chris A. Malachowsky,
3 David M. Shannon, Ajay K. Puri, Daniel F. Vivoli, Jeffrey D. Fisher, Brian M. Kelleher, Steven
4 Chu, Tench Coxe, James C. Gaither, Harvey C. Jones, William J. Miller, Mark L. Perry, A. Brooke
5 Seawell, Christine B. Hoberg, Curtis R. Priem, Di Ma, Mark L. Stevens and Mary Dotz through their
6 attorneys of record.

7 WHEREAS, on January 25, 2007, the Court ordered that plaintiffs shall file a Consolidated
8 Complaint by February 20, 2007; and

9 WHEREAS, plaintiffs have requested an extension from February 20, 2007 to February 28,
10 2007 to file and serve the Consolidated Complaint; and

11 WHEREAS, defendants do not object to such an extension of time.

12 THEREFORE, the undersigned parties stipulate as follows:

13 1. Plaintiffs shall file and serve the Consolidated Complaint by February 28, 2007.

14 IT IS SO STIPULATED.

15 DATED: February 20, 2007

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20 s/ Travis E. Downs III
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23 Co-Lead Counsel for Plaintiffs

24 *I, Travis E. Downs III, am the ECF user whose ID and password are being used to file this*
25 *Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint. In compliance with*
26 *General Order 45, X.B., I hereby attest that James N. Kramer has concurred in this filing.*

27 DATED: February 20, 2007

28 ORRICK, HERRINGTON & SUTCLIFFE LLP
JAMES N. KRAMER
RICHARD GALLAGHER
MICHAEL D. TORPEY

s/ James N. Kramer
JAMES N. KRAMER

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Attorneys for Defendants

1 *I, Travis E. Downs III, am the ECF user whose ID and password are being used to file this*
2 *Stipulation and [Proposed] Order Regarding Filing of Consolidated Complaint. In compliance with*
3 *General Order 45, X.B., I hereby attest that Karin Kramer has concurred in this filing.*

4 DATED: February 20, 2007

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LEIGH A. KIRMSSE

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6 s/ Karin Kramer
7 KARIN KRAMER

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11 415/848-4999 (fax)

Attorneys for Defendant Christine B. Hoberg

12 * * *

13 **ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 DATED: 2/22/07

16 
THE HONORABLE SAUNDRA B. ARMSTRONG
UNITED STATES DISTRICT JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that on February 20, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Travis E. Downs III

TRAVIS E. DOWNS III

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Mailing Information for a Case 4:06-cv-06110-SBA

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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